

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRAD AMOS,)	
)	Case No. 3:21-cv-00923
Plaintiff,)	
)	District Judge Richardson
v.)	
)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC, et al,)	
)	Jury Demand
Defendants.)	

**SUPPLEMENTAL RESPONSES TO PLAINTIFF'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT LAMPO GROUP**

Defendant Lampo Group submits the following supplemental responses to the following requests in Plaintiff's First Request for Production of Documents to Defendant Lampo Group:

4. A copy of all notes, statement, or other documents regarding Plaintiff.

RESPONSE: *This response replaces Defendant Lampo's original response to this Request No. 4.*

Objection. Request No. 4 seeks information that is neither relevant nor proportional to the needs of the case. Specifically, to search for every note, statement or document regarding Plaintiff would require a company-wide search for 2 years for over 1000 custodians. Without waiving this objection, Defendant Lampo has produced all responsive documents generated by the searches as described in Defendant's Response to First Request for Production of Documents to Defendant Lampo Group. Defendant Lampo will produce any responsive documents it discovers as a result of the additional searches it has agreed to do as described in Supplemental Responses to First Request for Production of Documents to Defendant Lampo Group. If the documents are protected by the attorney-client privilege or the work product

doctrine, then Defendant Lampo will withhold those documents and produce a privilege log in compliance with FRCP Rule 26(b)(5)(A).

25. A copy of all documents and/or communications created for, or as a result of, any termination meeting with Plaintiff.

RESPONSE: *This response replaces Defendant Lampo's original response to this Request No. 25.*

Defendant Lampo has provided all documents in its possession responsive to this request.

26. A copy of all emails where Plaintiff is a recipient.

RESPONSE: *This response replaces Defendant Lampo's original response to this Request No. 26.*

Defendant Lampo will produce all documents in Plaintiff's Outlook account maintained by Defendant Lampo.

Respectfully submitted,

/s/Leslie Goff Sanders
Leslie Goff Sanders (TN #18973)
Daniel Crowell (TN #31485)
Stephen Stovall (TN #37002)
BARTON PLLC
611 Commerce Street
Suite 2603
Nashville, TN 37203
Telephone: (615) 340-6790
Fax: (615) 238-6762
lsanders@bartonesq.com
dcrowell@bartonesq.com
sstovall@bartonesq.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that, on February 2, 2023, I sent the foregoing *Supplemental Responses to Plaintiff's Second Request for Production of Documents to Defendant Lampo Group* via email to:

Jonathan A. Street
Brandon Hall
Cullen Hamelin
Lauren Irwin
THE EMPLOYMENT AND CONSUMER LAW GROUP
street@eclaw.com
bhall@eclaw.com
chamelin@eclaw.com
lauren@eclaw.com

Attorneys for Plaintiff

/s/Leslie Goff Sanders
Daniel Crowell (TN #31485)
Attorney for Defendants